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November 22, 2021

**VIA EMAIL AND ECF**

Hon. Marian W. Payson  
United States Magistrate Judge  
100 State Street  
Rochester, New York 14614

**Re: Request for Permission to Travel on Business  
*USA v. Phillips*, 21 MJ 4062 (MWP)**

Dear Judge Payson:

On behalf of defendant Mark Anthony Phillips in the above-captioned case, I respectfully request that Mr. Phillips' conditions of bail be modified to permit travel on November 29, 2021 to St. Petersburg, Florida for meetings scheduled on November 30, returning home on December 1 or 2, 2021.

The purpose of the trip is to view a property at 695 Central Ave., St. Petersburg, FL that he and his partners are planning on renting as an additional restaurant location. The restaurant currently has two locations in New York. The meetings are with the realtor and the property owner, to negotiate terms.

I have spoken to Assistant United States Attorney Kyle Rossi and to Mr. Phillips' Pretrial Services Officer, Jennifer Cannito, about this application. Neither one has an objection to the bail modification herein requested.

Sincerely,

*s/s Camille M. Abate, Esq.*

cc: AUSA Kyle Rossi (via ECF)  
PTSO Jennifer Cannito (via ECF)

Request granted on the condition that prior to 10 am on 11/24/21 the defendant provide Officer Cannito with a detailed itinerary of this travel plans and contact information while in Florida. SO ORDERED.

*Marian W. Payson*

Marian W. Payson, U.S.M.J.  
November 23, 2021